

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

RUSSELL ZINTER; ET AL.

Plaintiffs,

v.

CHIEF JOSEPH SALVAGGIO; ET AL.

Defendants.

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CIVIL NO. SA-18-CA-680-FB

ALTERNATIVE DISPUTE RESOLUTION REPORT

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant CITY OF LEON VALLEY (“City”), files this Alternative Dispute Resolution Report pursuant to this Court’s Scheduling Order, dated October 30, 2020. [Dkt No. 83].

1. Counsel for Defendant City informed the clients of the alternative dispute resolution procedures available in the Western District of Texas.

2. Plaintiffs have not submitted a written settlement offer to Defendant City. Plaintiffs’ deadline to submit a written settlement offer is December 4, 2020. Defendant City will respond to the offer on or before December 21, 2020, if Plaintiffs’ demand is timely submitted, in accordance with the Scheduling Order.

3. The individuals responsible for settlement negotiations on behalf of Defendant City are Patrick C. Bernal and Adolfo Ruiz.

4. Defendant City recognizes ADR methods approved by this Court, but feel at this time, alternative dispute resolution is premature pending further discovery. The parties are just

beginning formal discovery. Mediation may be appropriate at a later stage in these proceedings after appropriate discovery and further case development.

Signed this 9th day of November, 2020.

Respectfully submitted,

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BY: /s/ Adolfo Ruiz
PATRICK C. BERNAL
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ADOLFO RUIZ
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ATTORNEYS FOR DEFENDANTS
CITY OF LEON VALLEY

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served in accordance with the Federal Rules of Civil Procedure on this 9th day of November, 2020, to the following:

Solomon M. Radner
EXCOLO LAW, PLLC
26700 Lahser Rd, Suite 401
Southfield, MI 48033

E-NOTIFICATION

Charles S. Frigerio
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111 Soledad, Ste. 840
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E-NOTIFICATION

/s/ Adolfo Ruiz
PATRICK C. BERNAL
ADOLFO RUIZ